

**U.S. Department of Justice**
Civil Division

July 3, 2025**By ECF**

Honorable Michael E. Farbiarz
United States District Judge
Martine Luther King, Jr., Building
and U.S. Courthouse
Newark, New Jersey 07101

Re: ***Khalil v. Joyce, et al.*, Civ. Act. No. 25-1963 (MEF) (MAH)**
Government's Response to ECF Nos. 332, 334

Dear Judge Farbiarz:

Respondents (the "Government") submit this letter in response to the Court's Order, ECF No. 334, and to Petitioner Mahmoud Khalil's letter regarding compliance with the preliminary injunction ("PI"), ECF No. 332. Given the differing positions regarding the scope of the PI, the Government recommends that the parties engage in motions practice over the PI's interpretation. The Government declines to offer a substantive response at this time, because Petitioner's request is for a status conference. The Government is reserving its substantive arguments for when Petitioner presents his arguments. And such a response by the Government requires time for the undersigned to confer with the various interested parties, draft a response, and obtain proper review. The Government therefore requests that the Court set a briefing schedule to allow the parties a reasonable time and opportunity to set forth more fully their respective legal positions, including permitting the Government fourteen (14) days to respond to Petitioner's filing.¹

Respectfully submitted,

BRETT A. SHUMATE
Assistant Attorney General
Civil Division

DREW C. ENSIGN
Deputy Assistant Attorney General

DHRUMAN Y. SAMPAT
Senior Litigation Counsel

/s/ Alanna T. Duong
ALANNA T. DUONG
Senior Litigation Counsel
Office of Immigration Litigation
Civil Division, U.S. Dept. of Justice
Washington, D.C. 20044
alanna.duong@usdoj.gov

RACHEL L. BROWNING
Senior Trial Attorney

¹ Please be advised that lead counsel, Dhruman Y. Sampat, will be out of the office and traveling internationally from July 22 to 29, 2025.